

A. Production Format from Paper Documents

All documents (whether originally electronic or hard copy paper) should be produced as TIFF image files[#] (black-and-white) or as JPEG image files[#] (color) in electronic form on a CD-ROM, or on other removable media. All production documents should be accompanied by a Concordance .DAT load file. The Concordance .DAT file should contain the following delimiters:

Field Separator	¶	(ASCII:0020)
Quote	”	(ASCII:0025)
Multi-Entry Delimiter	;	(ASCII:0059)
<Return> Value in Data	®	(ASCII:0174)

The TIFF images should be produced as single-page Group IV TIFF format with an Opticon image load file. The Opticon image load file should contain the BEGBATES value for each corresponding document and appropriate path or folder information to the corresponding images that comprise each document. Each TIFF or JPEG image should be individually Bates numbered (each party using a unique prefix of letters as appropriate, without punctuation, and each page having a unique number of at least six digits, with no separator between the letters and numbers). The Bates number must not obliterate, conceal, or interfere with any information on the produced document.

B. Production Format from Electronic Format.

For documents that are produced directly from electronic format, the full extracted text will be provided by a link in the main (.DAT) load file.

To the extent readily available at the time of retrieval, the following extracted data and metadata fields shall to be provided in the Concordance .DAT file:

- FOR E-MAIL AND E-DOCS (REQUIRED)
 - PRODUCTION BEG NUM
 - PRODUCTION END NUM

- PRODUCTION BEG ATTACH¹
- PRODUCTION END ATTACH
- CUSTODIAN²
- CONFIDENTIALITY DESIGNATION
- MESSAGE FROM
- MESSAGE TO
- MESSAGE CC
- MESSAGE BCC
- MESSAGE SUBJECT
- MESSAGE DATE/TIME SENT[#]
- MESSAGE DATE/TIME SENT OFFSET^Δ
- MESSAGE DATE/TIME RECEIVED[#]
- MESSAGE DATE/TIME RECEIVED OFFSET^Δ
- MESSAGE ATTACHMENT COUNT
- MESSAGE ATTACHMENT NAMES
- MESSAGE HAS ATTACHMENTS
- TIME ZONE OFFSET[∞]
- FILE AUTHOR
- FILE DATE CREATED[#]
- FILE DATE CREATED OFFSET^Δ
- FILE DATE MODIFIED[#]
- FILE DATE MODIFIED OFFSET^Δ
- FILE NAME
- FILE SIZE
- FILE EXTENSION
- ORIGINAL FOLDER NAME³
- PAGE COUNT
- MD5 HASH
- LINK TO NATIVE FILE⁴
- LINK TO EXTRACTED TEXT⁵

¹ PRODUCTION BEG ATTACH should contain the PRODUCTION BEG NUM value of an attachment's parent document. PRODUCTION BEG ATTACH for a parent document is equal to the PRODUCTION BEG NUM for the parent document.

² If it has been captured.

³ Mailbox Path for E-Mails or Original Path for E-Docs.

⁴ Only for data being produced natively; see Section D below.

⁵ Extracted text will be provided at the document level – not the page level.

[#] Native metadata for date/time fields provided in UTC/GMT; production images will be adjusted to specific time zone pursuant to date/time offset

^Δ Offset to conform date/time fields to specified time zone (per Custodian)

[∞] Time Zone identified (per Custodian) that is used to conform date/time fields to specified time zone

- FOR SCANNED HARDCOPY DOCUMENTS
- PRODUCTION BEG NUM
- PRODUCTION END NUM
- PAGE COUNT
- LINK TO TEXT⁶

These are the only metadata fields that the parties are required to collect and produce, to the extent they are readily available at the time of retrieval.

C. DeDuplication

Cross-Custodian DeDuplication⁷ (also known as Horizontal Duplication) will be applied to all data. Duplicate custodian name and a duplicate custodian path will be provided to memorialize the location of all deduped data.

D. Native Production

Where feasible, non-redacted Excel, Multi-Media and PowerPoint files shall be produced in their native format.

E. Databases or Structured Data.

If a party is providing databases or structured data, the parties will confer to discuss the appropriate delivery format unless the data is provided in Excel or CSV format.

F. Social Media and Web Content.

Social media and other web content shall be produced as Group IV TIFF image files (black-and-white) and JPEG image files (color) with associated metadata load files. The parties will further confer regarding the specific web pages and available metadata.

⁶ Extracted text will be provided at the document level – not the page level.

⁷ See *The Sedona Conference Glossary: E-Discovery & Digital Information Management*, p. 11 (2d ed. 2010).